

**Federal Defenders
OF NEW YORK, INC.**

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December 16, 2020

BY ECF

The Honorable Judge Sidney H. Stein
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

RE: United States v. Desirae Schneider
20 Cr. 325 (SHS)

Dear Judge Stein,

I write to request a temporary modification to Desirae Schneider's bail conditions in the above-captioned case to allow Ms. Schneider to drive to Astoria and then to Long Island City, Queens on Saturday, December 19, 2020 to attend a small wedding. In addition, Ms. Schneider requests permission to drive to Illinois to visit her family, including her mother, who is a co-signer on her bond, from Monday, December 21 through Sunday, December 27, 2020. Pretrial services and the Government do not object to these requests.

On March 16, 2020, Ms. Schneider was presented in Magistrate Court. The following bail conditions were set and subsequently met:

\$50,000 personal recognizance bond to be co-signed by two financially responsible persons; compliance with pre-trial supervision and mental health treatment as directed; surrender of travel documents with no new applications and travel restricted to the Southern District of New York; no contact with the alleged victim outside the presence of counsel; surrender keys to the complainant's home; continued employment; no "dark web" use; no possession of firearms/destructive devices/other weapons; and GPS monitoring.

On June 22, 2020, Magistrate Judge Gorenstein granted Ms. Schneider's request for a temporary bail modification to allow her to travel to Milford, Connecticut from Saturday, June 27 through Sunday, June 28 to attend a small outdoor wedding. Ms. Schneider attended the wedding without incident. On July 29, 2020, the Court granted Ms. Schneider's request for a temporary bail modification to enable her to travel to Illinois to visit her family for one week in August 2020. Ms. Schneider planned this trip in consultation with her pretrial services officer.

On August 6, 2020, the Court granted Ms. Schneider's request for a temporary bail modification to enable her to drive to Milford, Connecticut for a small birthday gathering with friends on August 9, 2020. On September 18, 2020, the Court granted Ms. Schneider's request for a temporary bail modification to enable her to drive to Milford, Connecticut to visit friends on September 20, 2020. On October 16, 2020, the Court granted Ms. Schneider's request for a temporary bail modification to drive to Astoria, Queens to visit friends on that day. Since the start of this case, Ms. Schneider has remained in consistent compliance with the conditions of her release. On November 4 and December 2, 2020, the Court granted Ms. Schneider's request for a temporary bail modification to drive to Astoria, Queens to visit friends and stay overnight.

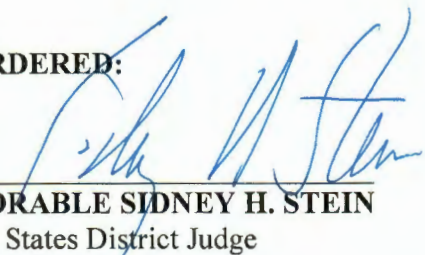
Ms. Schneider now respectfully requests a temporary bail modification to enable her to drive to Astoria and Long Island City, Queens on Saturday, December 19, 2020 for a small wedding. In addition, Ms. Schneider requests permission to drive to Illinois to visit her family, including her mother, who is a co-signer on her bond, from Monday, December 21 through Sunday, December 27, 2020. The complainant in this case will not be at the wedding in Queens nor at Ms. Schneider's family's home in Illinois.

Respectfully submitted,

/s/

Marne Lenox
Assistant Federal Defender
(212) 417-8721

SO ORDERED:



HONORABLE SIDNEY H. STEIN
United States District Judge

Dated: New York, New York
December 16, 2020

cc: Rebecca Dell, Assistant U.S. Attorney (by ECF)
Jonathan Lettieri, Pre-Trial Services Officer (by email)